

**EXHIBIT 37**  
**FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT  
2 EASTERN DISTRICT OF TEXAS  
3 SHERMAN DIVISION  
4 - - -

5 THE STATE OF TEXAS, et al. : Civil Action No.  
6 Plaintiffs, : 4:20-cv-00957-SDJ  
7 vs. :  
8 GOOGLE LLC, :  
9 Defendants. :  
10 - - -

11 MAY 21, 2024  
12 HIGHLY CONFIDENTIAL  
13 - - -

14 Remote Videotape Deposition,  
15 taken via Zoom, of [REDACTED],  
16 commencing at 9:06 a.m., on the above  
17 date, before Amanda Maslynsky-Miller,  
18 Court Reporter and Certified Realtime  
19 Reporter.  
20 - - -

21  
22  
23  
24 Job No. MDLG6691770

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18 - - -

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I N D E X  
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Testimony of: [REDACTED] [REDACTED]

By Attorney Chang

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NO.	DESCRIPTION	PAGE
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DEPOSITION SUPPORT INDEX

- - -

Direction to Witness Not to Answer

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None					

Stipulations

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Question Marked

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None					

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Q. Let's talk about the  
different channels that you use to  
communicate.

You -- you mentioned e-mail,  
right? This is an e-mail, you used  
e-mail to communicate with your  
colleagues; is that correct?

A. Yes, e-mail is one of the  
channels.

Q. And you had conversations in  
person, I presume?

A. Yes, we had a lot of  
in-person conversations.



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ATTORNEY CHANG: Let's take  
this exhibit down. Let's pull up

- - -

(Whereupon, Exhibit-451,

- - -

BY ATTORNEY CHANG:

Q. Mr. [REDACTED], let me know  
when you see it.

A. I'm still waiting.

1 the record occurred.)

2 - - -

3 VIDEO TECHNICIAN: Back on  
4 the record, 5:11 p.m.

5 BY ATTORNEY CHANG:

6 [REDACTED]  
7 understanding that the litigation hold  
8 you received in this case covers?

9 A. You know, in general the  
10 e-mail came from product counsel. And  
11 high-level, high understanding, to

12 [REDACTED]  
13 And, in general, the feedback that I  
14 received was not to delete documents or  
15 e-mails from that time period.

16 Q. How about chats?

17 A. Yes, I believe the feedback,  
18 you know, was, general, not to delete any  
19 information that I have in any form that  
20 could pertain to my time on Google Ad  
21 Manager.

22 Q. And before you received this  
23 litigation hold, you had no understanding  
24 that you weren't supposed to delete

1 information or documents from that time  
2 period, then, right?

3 A. That's correct. No one had  
4 explicitly told me not to.

5 Q. Did anyone implicitly tell  
6 you?

7 A. No. And, you know, in  
8 general, you know, I -- I preserve all my  
9 documents. I don't go through and delete  
10 them.

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16 ATTORNEY BOSCO: Objection.

17 THE WITNESS: Yeah.

18 Probably a couple months ago,  
19 yeah.

20 BY ATTORNEY CHANG:

21 Q. It was this year?

22 ATTORNEY BOSCO: Object to  
23 the form.

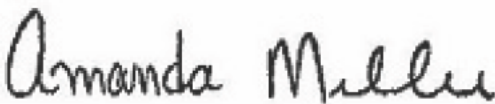
24 THE WITNESS: Yeah, it was

CERTIFICATE

I, Amanda Maslynsky-Miller, Certified Realtime Reporter, do hereby certify that prior to the commencement of the examination, [REDACTED], was remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my ability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not financially interested in the action.



Amanda Miller

Certified Realtime Reporter

Dated: May 22, 2024

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)